

**Hearing Date and Time: September 14, 2016 at 10:00 a.m. (Prevailing Eastern Time)**  
**Response Date and Time: August 11, 2016 at 4:00 p.m. (Prevailing Eastern Time)**

**MORRISON & FOERSTER LLP**

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*Counsel for The ResCap Borrower Claims  
Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: ) Case No. 12-12020 (MG)  
 )  
RESIDENTIAL CAPITAL, LLC, et al., ) Chapter 11  
 )  
Debtors. ) Jointly Administered  
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**NOTICE OF THE RESCAP BORROWER CLAIMS TRUST'S  
NINETY-FOURTH OMNIBUS OBJECTION TO CLAIMS ((I) NO LIABILITY  
BORROWER CLAIMS, (II) REDESIGNATE, RECLASSIFY, REDUCE AND  
ALLOW BORROWER CLAIM, (III) RECLASSIFY, REDUCE AND  
ALLOW BORROWER CLAIM, AND (IV) REDESIGNATE  
AND ALLOW BORROWER CLAIM)**

**PLEASE TAKE NOTICE** that the undersigned have filed the attached *ResCap  
Borrower Claims Trust's Ninety-Fourth Omnibus Objection to Claims ((I) No Liability  
Borrower Claims, (II) Redesignate, Reclassify, Reduce and Allow Borrower Claim, (III)  
Reclassify, Reduce and Allow Borrower Claim, and (IV) Redesignate and Allow  
Borrower Claim)* (the "Omnibus Objection"), which seeks to alter your rights by  
disallowing your claim against the above-captioned Debtors.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Omnibus Objection will take place on **September 14, 2016 at 10:00 a.m. (Prevailing Eastern Time)** before the Honorable Martin Glenn, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408, Room 523.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Omnibus Objection must be made in writing, conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Notice, Case Management, and Administrative Procedures approved by the Bankruptcy Court [Docket No. 141], be filed electronically by registered users of the Bankruptcy Court's electronic case filing system, and be served, so as to be received no later than **August 11, 2016 at 4:00 p.m. (Prevailing Eastern Time)**, upon: (a) Chambers of the Honorable Martin Glenn, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408; (b) counsel to the ResCap Borrower Claims Trust, Morrison & Foerster LLP, 250 West 55<sup>th</sup> Street, New York, NY 10019 (Attention: Norman S. Rosenbaum, Jordan A. Wishnew, and Jessica J. Arett); (c) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014 (Attention: Linda A. Riffkin and Brian S. Masumoto); (d) The ResCap Borrower Claims Trust, Polsinelli PC, 900 Third Avenue, 21st Floor, New York, NY 10022, (Attn: Daniel J. Flanigan) and (e) The ResCap Liquidating Trust, Quest Turnaround Advisors, 800 Westchester Avenue, Suite S-520, Rye Brook, NY 10573 (Attention: Jeffrey Brodsky).

**PLEASE TAKE FURTHER NOTICE** that if you do not timely file and serve a written response to the relief requested in the Omnibus Objection, the Bankruptcy Court may deem any opposition waived, treat the Omnibus Objection as conceded, and enter an order granting the relief requested in the Omnibus Objection without further notice or hearing.

Dated: July 11, 2016  
New York, New York

Respectfully Submitted,

/s/ Norman S. Rosenbaum

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